

1 KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
2 (jkim@kbkllp.com)
David A. Taylor (#247433)
3 (dtaylor@kbkllp.com)
Gabrielle L. Albert (#190895)
4 (galbert@kbkllp.com)
650 California Street, Suite 1900
5 San Francisco, CA 94108
Tel: 415 496 6723
6 Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF REORGANIZED DEBTORS'
ONE HUNDRED FIFTEENTH OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY
RECATEGORIZED CLAIMS)**

Response Deadline:
May 24, 2022, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: June 7, 2022

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **TO: (A) THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**
3 **CLAIMANTS; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**

4 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
5 debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan (as
6 defined below), the “**Reorganized Debtors**”) in the above-captioned Chapter 11 cases (the
7 “**Chapter 11 Cases**”), respectfully request that the Court take judicial notice pursuant to Federal Rule
8 of Evidence 201 of the contents and information contained in the following websites described in
9 subparagraphs a thru h below.

- 10 a. Carr Fire: National Park Service, “National Park Service Releases Investigation Report
11 for 2018 Carr Fire,” [https://www.nps.gov/whis/learn/news/national-park-service-](https://www.nps.gov/whis/learn/news/national-park-service-releases-investigation-report-for-2018-carr-fire.htm)
12 [releases-investigation-report-for-2018-carr-fire.htm](https://www.nps.gov/whis/learn/news/national-park-service-releases-investigation-report-for-2018-carr-fire.htm).
- 13 b. Ferguson Fire: United States Department of Agriculture, Forest Service, “Cause of the
14 Ferguson Fire determined,” [https://www.fs.usda.gov/detail/sierra/news-](https://www.fs.usda.gov/detail/sierra/news-events/?cid=FSEPRD598317)
15 [events/?cid=FSEPRD598317](https://www.fs.usda.gov/detail/sierra/news-events/?cid=FSEPRD598317).
- 16 c. Mendocino Complex Fire: Cal Fire, Ranch Fire (Mendocino Complex) Incident,
17 <https://www.fire.ca.gov/incidents/2018/7/27/ranch-fire-mendocino-complex/>.
- 18 d. Pawnee Fire: Cal Fire report attached hereto as **Exhibit 1**.
- 19 e. Rocky Fire: Cal Fire, Rocky Fire Incident,
20 <https://www.fire.ca.gov/incidents/2015/7/29/rocky-fire/>.
- 21 f. Thomas Fire: Ventura County Fire Department, [https://vcfd.org/news/vcfd-determines-](https://vcfd.org/news/vcfd-determines-cause-of-the-thomas-fire/)
22 [cause-of-the-thomas-fire/](https://vcfd.org/news/vcfd-determines-cause-of-the-thomas-fire/).
- 23 g. Whittier Fire: Wildfire Today, [https://wildfiretoday.com/2018/02/05/forest-service-](https://wildfiretoday.com/2018/02/05/forest-service-releases-cause-whittier-fire/)
24 [releases-cause-whittier-fire/](https://wildfiretoday.com/2018/02/05/forest-service-releases-cause-whittier-fire/)
- 25 h. Woolsey Fire: State of California Department of Justice, “California Department of
26 Justice Closes Criminal Investigation Into the Woolsey Fire”
27 [https://oag.ca.gov/news/press-releases/california-department-justice-closes-criminal-](https://oag.ca.gov/news/press-releases/california-department-justice-closes-criminal-investigation-woolsey-)
28 [investigation-woolsey-](https://oag.ca.gov/news/press-releases/california-department-justice-closes-criminal-investigation-woolsey-)

[fire#:~:text=Consistent%20with%20the%20scientific%20findings,Edison%20caused%20the%20Woolsey%20Fire.](#)

Under Federal Rules of Evidence 201, the Court “must take judicial notice if a party requests it and the court is supplied with the necessary information.” Fed. R. Evid. 201(b). The above websites may be judicially noticed because they are not subject to reasonable dispute and “can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed. R. Evid. 201(b)(2). Further, courts may take judicial notice of government agency website pages. *See Cairns v. Franklin Mint Co.*, 107 F. Supp. 2d 1212, 1216 (C.D. Cal. 2000) (taking judicial notice of pages from a museum’s website); *McLaughlin v. Volkswagen of Am., Inc.*, 2000 WL 1793071, n.3 (E.D. Pa. Dec. 6, 2000) (taking judicial notice of contents of the National Highway Transportation Safety Website). The Reorganized Debtors have satisfied this criterion by this Request for Judicial Notice. Accordingly, the Reorganized Debtors respectfully request that the Court take judicial notice of the above-described websites submitted as evidence in support of Reorganized Debtors’ One Hundred Fifteenth Omnibus Objection to Claims (No Liability Recategorized Claims).

Dated: April 18, 2022

KELLER BENVENUTTI KIM LLP

By: /s/ Gabrielle L. Albert
Gabrielle L. Albert

Attorneys for Debtors and Reorganized Debtors